Recommendations of the Tree Task Force

Presented to the Land Use and Transportation Subcommittee

May 8, 2006 Austin, Texas

TREE TRIMMING TASK FORCE MEMBERSHIP

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Tree Task Force Report of Recommendations

EXECUTIVE SUMMARY

—Recognize Trees as Essential Urban Infrastructure

Recommendations include establishment of an oversight/coordination system to better integrate preservation of the urban forest among programs spread through at least nine city departments, to provide a channel for communication, and to review studies and issues related to trees. Support is requested for the Urban Forestry Board inventory to serve as a management tool. Recommendations also call for increased City funding to manage and plant street and park trees through a newly created Forestry Department in Public Works and PARD.

—Review of Austin Energy Vegetation Management Program

The Tree Task Force evaluated current laws, regulations and safety standards concerning tree trimming, and looked to innovative approaches used in other cities to reconcile the desire for both reliability of electric services and preservation of tree canopy. Austin Energy is amenable to conducting growth rate study to reassess clearance requirements, pruning criteria, species-specific exemptions, and a shortened trim cycle. They are open to evaluating other recommendations made.

—Pursue Engineering Alternatives

Recommendations include pilot programs and engineering testing of creative alternatives developed by Austin Energy Engineering for insulated overhead wire installation, as well as practices used in other cities including higher poles, consolidation of lines, zig-zagging of street lines and installation of tree wire to protect wires from tree branches.

-Work with Citizens and Neighborhoods

Recommendations for implementation of new notification and consultation procedures adopted by Austin Energy, new mitigation procedures and customer alternatives as practiced in other cities. Recommendation for expanded Citizen Forester education program.

—Strengthen the Tree Preservation Ordinance

Recommendations to protect healthy Class 1 trees 10 inches in diameter or greater from excessive pruning or removal; amend the standard for protected trees; strengthen mitigation practices by providing larger sized trees for mitigation planting; create more powerful incentives to preserve trees and stiffer penalties for their destruction.

-Preserve Main Corridors

Recommend development of main corridor designation based on level of existing tree canopy, use by the public, pedestrian traffic and connection to civic centers such as the University of Texas; require alternative system engineering design for such corridors when economically feasible and require advance approval by oversight system of mitigation in the event of unavoidable tree removal on these civic corridors.

—Funding Options

For preservation options to be viable for neighborhoods at every income level, public funds will need to be made available. We do not suggest any one entity bear the costs, but to draw on a variety of funding sources to provide adequate funds for effective programs. Funding alternatives applied in other cities are presented for consideration. Recommendations are also made for reallocation of \$1 million in the city's \$1.3 million fund set aside for underground utilities.

—Transitional Steps

Recommendations approved by Council should be implemented immediately by Austin Energy. To allow for both preservation and reliability, those areas or neighborhoods who choose the new options, in cases where implementation is delayed due to contingencies such as availability of committed funds, time to put administrative structures in place, or Austin Energy's investigation and evaluation processes as outlined in the Austin Energy Agreements, alternative vegetation management practices will be developed jointly by Austin Energy, the oversight system and Neighborhood Association representatives and /or individual customers. There will need to be definite commitments by Council, timelines, and structure put in place with implementation.

—Potential Future Steps

Consider enactment of a new or modified ordinance to prohibit intentional planting of incompatible vegetation on city easements or city property; prohibit sale of invasive or low quality trees; require nurseries to tag trees to display height at maturity.

—Accomplishments in Place

The Tree Task Force can bring to the Council accomplishments already in place concerning Austin Energy's vegetation management policies. Austin Energy has implemented or agrees to implement the following:

- Notify the Neighborhood Associations involved before any planned circuit vegetation maintenance work planning is begun
- Prepare and distribute a customer options sheet with every vegetation work plan
- Purchase flagging for marking trees that has Austin Energy logo on it
- On a tree by tree basis evaluate the selective removal of overhanging limbs on single phase primary wires using the hinge and miss evaluation technique
- Offer to redesign/relocate the lines if possible at the customer's expense

- Provide larger size utility compatible mitigation trees for trees to be planted on COA owned property and PARD will provide watering and care for the 2 year establishment period (note added: mitigation to follow PARD planting guidelines)
- Re-contact all property owners with vegetation work plans on F101

BACKGROUND

In February 2006 the City Council passed a Tree Resolution which directed the City Manager to assemble a task force to review, develop, and recommend to Council policies and procedures related to the City of Austin's tree trimming removal program. The Resolution was in response to Hyde Park, Hancock, and Eastwoods Neighborhood Associations' request for a review of Austin Energy's vegetation management plan and to incorporate tree management into planning for preservation and livability of Austin's inner-city neighborhoods. Members of the Tree Task Force are listed on a separate page and include representatives from various City of Austin departments, Austin Energy, the Urban Forestry Board, neighborhood groups and associations, and business professionals involved in landscape architecture.

The Tree Task Force met weekly from March to May and worked to:

- Assess current utility clearance standards in Austin and other cities
- Review current laws, regulations and safety standards concerning tree trimming
- Review utility line system design alternatives (e.g., undergrounding and reconfiguring lines):
- Review costs associated with alternative approaches
- Review tree replacement (mitigation) programs
- Assess the value of our urban forest with regard to energy consumption, storm water runoff, urban heat reduction, property values, air pollution, noise pollution, and general quality of life
- Review programs and practices developed by San Antonio, Tulsa, San Francisco, Palo Alto, Colorado Springs, San Jose, Newport, Tacoma, Augusta, Tallahassee and other cities.

RECOMMENDATIONS

1. RECOGNIZING TREES AS INFRASTRUCTURE

Many cities in the United States are including trees as part of city infrastructure for better management of their urban forest and use of resources. Attached is a summary of urban forest valuations. Recognition of this value can contribute to planning for viable and sustainable growth. The City of Austin can gain efficiencies through increased coordination among its programs, departments, and utilities that have an impact on trees, as well as planning for enhancement of the urban forest. The Tree Task Force makes the following recommendations:

1.a The Austin City Council direct the City Manager to develop and propose a Community Oversight System involving city departments and members of the public to improve coordination

of existing entities to enhance the preservation, protection, and planting of trees as part of Austin's infrastructure.

This oversight system would draw on existing structures and resources of the city including the Urban Forestry Board, neighborhood associations, Neighborhood Planning & Zoning, Planning Commission, PARD, city utilities, and Austin Energy.

Among this Oversight System's recommended responsibilities will be:

- Coordinate Infrastructure projects among city departments and Austin Energy to identify and take advantage of new synergies and potential cost savings for such steps as the underground placement of current overhead utility lines.
- Review results of studies, pilots, mitigation programs, as well as input from the community to resolve issues and broaden communication on tree related concerns.
- **1.b** Develop planned and managed street tree planting (Parks, Public Works, and Neighborhood Planning & Zoning)
- **1.c** Support Urban Forestry Board inventory to provide data set for analysis of increased coverage needs
- **1.d** Facilitate the creation of a new Forestry Department in Public Works to begin planting and caring for street trees.
- **1.e** Increase PARD forestry budget—keep PARD forestry in the parks.

2. REVIEW OF AUSTIN ENERGY VEGETATION MANAGEMENT PROGRAM

The Tree Task Force evaluated current laws, regulations and safety standards concerning tree trimming and found there is room for discernment in federal and state law. We looked to innovative approaches to reconcile the desire for both reliability of electric services and preservation of tree canopy used in other cities, in particular Tulsa and Tallahassee. The charge of the task force also provided for open dialog with Austin Energy which allowed issues on all sides to be aired. Recommendations here are:

- **2.a** Reassess required clearances
 - Reduce clearance for overhang on single phase lines.
 - Austin Energy to conduct growth rate study to reassess clearance requirements, pruning criteria, species-specific exemptions, and shortened trim cycle.
- **2.b** Investigate the use and effectiveness of tree growth regulators on appropriate trees, i.e., no nut or fruit bearing trees.
- **2.c** Adopt an optional customer-directed alternative for one-year maintenance cycle paid by property owner based on the Tulsa model.

- **2.d** Make adjustments to line clearance contracts
 - Allow for a mixed contract terms such as fee for service and time and materials billing with a 6-month review of rates that includes review of performance standards.
 - Allow for customer feedback.
 - Eliminate contractual incentives to remove mature trees; create incentives for contractors to preserve rather than destroy mature trees.
 - Create incentives for responsiveness to customer identified hazards and customer directed trimming.

3. Pursue Engineering Alternatives

Older neighborhoods have not had the benefit of comprehensive utility infrastructure design such as is coordinated for new subdivisions or developments. The distribution lines have come in as need has demanded. The Tree Task Force researched what other cities have done to underground including San Antonio, Palo Alto, Oakland, Portland, Colorado Springs, Brookline, and Tulsa. We also benefited from presentations by engineer Bob Seaver with Austin Energy on the different system design alternatives to reduce tree trimming. Recommendations are:

- **3.a** Austin Energy be instructed to evaluate alternative system engineering design whenever extensive trimming and removal is required under the vegetation management plan or where protected trees will be affected. Alternatives will include:
 - Undergrounding
 - Relocating lines / Consolidating lines / Zigzagging
 - Raising Poles
 - Tree Wire
 - URD Cable Overhead
- **3.b** Austin Energy will evaluate alternative system engineering design whenever healthy trees twenty-four inches in diameter or larger trees to be affected. If the alternative design is determined to be economically viable, AE will perform the alternative construction.
- **3.c** Neighborhoods and blocks may request system engineering design alternatives contingent on funding or if customers pay for alternatives.
- **3.d** Develop criteria for required alternative designation and for neighborhoods to opt into program. Proposals reviewed by the oversight system.

4. WORK WITH CITIZENS AND NEIGHBORHOODS

The Tree Task Force looked for ways to improve communication between citizens and Austin Energy. We also sought ways citizens could be more active in the process of tree management and to improve the mitigation program. Several recommendations discussed have already been agreed to by Austin Energy and are listed under the section Accomplishments in Place. Recommendations are:

- **4.a** Create an alternative Citizen Forester program to recruit and train citizen volunteers to alert Austin energy of true tree hazards as a better way to maintain reliability and lessen trimming requirements.
- **4.b** Increase public education for "right tree in the right place" for both public and commercial interests.
- **4.c** AE offers 5- to 10-gallon trees in customer mitigation program and larger size trees for planting on City of Austin owned property or right of ways.

5. STRENGTHEN AUSTIN'S TREE PRESERVATION ORDINANCE

Austin has experienced rapid growth and the tree canopy has and will continue to be depleted unless effective tree preservation and mitigation can be reinforced to provide for present as well as future health of our urban forest. We recommend:

Protected Trees:

- **5.a** Amend the standard for a "protected tree" from 19 inches in diameter to 10 inches in diameter.
- **5.b** Healthy Class 1 trees 10 inches in diameter or greater are protected against both excessive pruning and removal. Alternative system engineering design required if economically feasible or adjustments made to clearance standard.

Mitigation:

- **5.c** Any development or redevelopment construction should require maintaining or increasing the tree canopy up to 100% replacement either on or near the property where a tree is lost. Provides for mitigation with Class 1 trees where appropriate.
- **5.d** Require 10- to 20-gallon trees for mitigation on streets and in parks
- **5.e** Strengthen mitigation provisions of the tree protection ordinance and environmental criteria manual to provide more powerful incentives to preserve trees and exact stiffer penalties for their destruction adjusted regularly to the cost index.

6. Preserve Main Corridors

Austin initiatives such as Smart Growth or Envision Central Texas promote the concept of livable cities with higher densities. The term walkability has been coined. Protecting shaded street with high levels of pedestrian traffic is consistent with this planning approach and we make the following recommendations:

Main Corridor (Street) Protection:

- **6.a** Develop criteria for main corridor designation based on: level of tree canopy; use by general public and pedestrian traffic; connection to civic area; and consideration as main arterial street.
- **6.b** Require alternative system engineering design for preservation of canopy along the corridor when economically feasible.
- **6.c** For unavoidable vegetation maintenance or hazard tree removal, a mitigation plan is developed in advance of any clearance for review by oversight system. Exceptions made for emergency maintenance.

7. FUNDING OPTIONS

Addressing system engineering design alternatives, mitigation as an integrated part of the City's infrastructure, and increased cost born by Austin Energy to implement recommendations approved will take a sizable investment to get these initiatives up and running and a sustained budget to offer them into the future. For options to be viable for neighborhoods at every income level, public funds will need to be made available. We do not suggest any one entity bear the costs, but to draw on a variety of funding sources to provide adequate funds for effective programs.

- **7.a** The Tree Task Force has reviewed what other cities have done and recommend the Council consider these alternatives. Please see attached.
- **7.b** City planners should aggressively seek Mainstreet grants, block grants, and FEMA funds for infrastructure investments and mitigation.
- **7.c** Make options available for both customer-paid and city-funded conversion to undergrounding or other system engineering design alternative.
- **7.d** Reallocate funds from the 1.3 million in city fund for undergrounding:
 - To competition defined in Tree Resolution.
 - To commission an American Forests, or like entity, urban ecosystem analysis of Austin.
 - To fund a pilot directed by Bob Seaver of Austin Energy to explore system engineering design alternatives to tree trimming. Pilot will include use of URD cable overhead, installation of taller poles and/or reconfiguration of three-phase open-wire from cross-arm construction to a narrower profile open-wire configuration.
 - To design and planning for undergrounding a designated areas.

8. TRANSITION STEPS

The Tree Task Force has put forward a wide range of recommendations that, if approved, will take time to be fully implemented. The question of what happens in the interim for tree trimming in the neighborhoods is here addressed.

8.a The Tree Task Force recommendations approved by Council should be implemented immediately by Austin Energy. To allow for both preservation and reliability, those areas or neighborhoods who choose the new options, in cases where implementation is delayed due to contingencies such as availability of committed funds, time to put administrative structures in place, or Austin Energy's investigation and evaluation processes as outlined in the Austin Energy Agreements (see attached), alternative vegetation management practices will be developed jointly by Austin Energy, the oversight system and Neighborhood Association representatives and /or individual customers. Good faith on the part of those choosing alternative options should be evidenced. There will also need to be definite commitments by Council, timelines, and structures put in place with implementation.

8.b Fiesta 1 (F101) circuit vegetation plan conducted prior to moratorium is voided. Prior customer approvals voided. Under Austin Energy's new process, the Neighborhood Associations affected will be notified before any planned circuit vegetation maintenance work planning begins.

9. POTENTIAL FUTURE STEPS

The Tree Task Force did not have the opportunity to fully investigate the following issues, but deemed it important to bring them to Council's attention.

Noted for Future investigation:

9.a Create a new City of Austin Ordinance or modify the existing ordinance to prohibit the intentional and willful planting of incompatible vegetation on City of Austin easements as well as City owned property.

- **9.b** Prohibit the sale in the City of Austin of invasive or low-quality trees.
- **9.c** Require tree nurseries to tag trees to display height at maturity.

Attachments:
Summary of urban forest valuations
Summary of funding strategies
Austin Energy Agreements document

Summary of Urban Forest Valuations

A single mature shade tree provides the cooling equivalent of a 4-ton air conditioner and that tree-shaded neighborhoods are 4-6 degrees cooler than neighborhoods without trees.

Source: Austin Energy

The study confirmed that trees contribute value to residential property and indicates that this contribution is between 13 and 19% of the value of the property in the metropolitan area of Austin, Texas.

Source: Clay Martin, Robert Maggio, and David Appel, "The Contributory Value of Trees to Residential Property in the Austin Texas Metropolitan Area" published in the Journal of Arboriculture 15(3), March 1989

- A 25 ft tree reduces annual heating and cooling costs of typical residence by 8 to 12 percent.
- A mature tree canopy reduces air temperature by about 5 to 10 degrees.
- A healthy tree, say a 32ft ash tree, can produce about 260 lbs of oxygen annually.
- Tree canopies reduce smog levels by up to 6%.
- A mature tree absorbs from 120 to 240 lbs of small particles and gases of air pollution. In Sacramento, for example, this represents a value of \$28.7 million.
- A 32 ft tall street tree intercepts rainfall reducing stormwater runoff by 327 gallons.
- A survey showed 74% of the public preferred to patronize commercial establishments whose structures and parking lots have trees and other landscaping.
- A study showed landscaping amenities have the highest correlation with high occupancy rates
- For residential property, in one area a 6% increase in value was associated with trees; in another study and increase of 3.5 to 4.5% was reported.

Source: Center for Urban Horticulture, University of Washington, College of Forest Resources

The benefits of trees can be grouped into social, communal, environmental, and economic categories.

- Social: We like trees around us because they make life more pleasant. We feel serene, peaceful, restful, and tranquil in a grove of trees. Hospital patients have been shown to recover from surgery more quickly when their hospital room offered a view of trees. The strong ties between people and trees are most evident in the resistance of community residents to removing trees to widen streets.
- Communal: City trees often serve several architectural and engineering functions. They provide privacy, emphasize views, or screen out objectionable views. They reduce glare and reflection. They direct pedestrian traffic. They provide background to and soften, complement, or enhance architecture.
- Environmental: Trees alter the environment in which we live by moderating climate, improving air quality, conserving water, and harboring wildlife. The larger the tree, the greater the cooling. By using trees in the cities, we are able to moderate the heat-island effect caused by pavement and buildings in commercial areas. Leaves filter the air we breathe by removing dust and other particulates. Leaves also absorb other air pollutants—such as ozone, carbon monoxide, and sulfur dioxide—and give off oxygen.

• Economic: Air-conditioning costs are lower in a tree-shaded home. Heating costs are reduced when a home has a windbreak. Trees increase in value from the time they are planted until they mature. Trees are a wise investment of funds because landscaped homes are more valuable than nonlandscaped homes. Lowered electricity bills are paid by customers when power companies are able to use less water in their cooling towers, build fewer new facilities to meet peak demands, use reduced amounts of fossil fuel in their furnaces, and use fewer measures to control air pollution. Communities also can save money if fewer facilities must be built to control storm water in the region. Street trees improve curb appeal of a neighborhood, increasing real estate values by 5 to 20%.

Source: International Society of Arboriculture

- Studies have shown that parts of cities without cooling shade from trees can literally be "heat islands," with temperatures as much as 12 degrees Fahrenheit higher than surrounding areas.
- An average tree stores 13 pounds of carbon every year and a community forest can absorb enough carbon dioxide annually to compensate for driving a car 26,000 miles.
- The net cooling effect of a young, healthy tree is equivalent to ten room-size air conditioners operating 20 hours a day."—U.S. Department of Agriculture
- Trees properly placed around buildings can reduce air conditioning needs by 30 percent and can save 20 50 percent in energy used for heating."—USDA Forest Service
- Trees can be a stimulus to economic development, attracting new business and tourism. Commercial retail areas are more attractive to shoppers, apartments rent more quickly, tenants stay longer, and space in a wooded setting is more valuable to sell or rent."—The National Arbor Day Foundation
- "Healthy, mature trees add an average of 10 percent to a property's value."—USDA Forest Service

Source: www.coolcommunities.org

- Urban Ecosystems Analysis of the Washington, DC metropolitan area concluded that tree cover had reduced stormwater storage costs by US\$4.7 billion and generated annual air quality savings of \$49.8 million.
- A 2002 analysis for Seattle indicated that per tree average annual net benefits were \$1 to \$8 for a small tree, \$19 to \$25 for a medium-sized tree, and \$48 to \$53 for a large tree.
- A 2003 study found that having trees within high density neighborhoods lowers levels of fear, contributes to less violent and aggressive behavior, encourages better neighborhood relationships and better coping skills.

Source: Wolf, K. L. 2004. "Economics and Public Value of Urban Forests." Urban Agriculture Magazine, Special Issue on Urban and Periurban Forestry, 13:31-33.

Simulations of energy saving benefits for Sacramento and Phoenix found that 3 mature trees around homes cut annual air conditioning demand by 25 to 40%.

Source: McPherson et al, 1999, http://www.iclei.org

Houston's regional forest provides impressive value to its citizens: The replacement cost of the region's 663 million trees is valued at over \$205 billion. Trees store \$721 million worth of carbon.

Trees generate \$456 million worth of environmental benefits annually - amounting to \$109 per person per year.

Trees save \$131 million in residential energy costs and avoided power plant emissions each year - almost \$90 per household.

Houston's trees remove over 60,000 tons of air pollution per year.

Large trees and urban trees have greater roles in producing forest benefits:

Most trees are small. Only 30 percent of the region's trees are five inches in diameter or greater, but they generate over 60 percent of total environmental benefits.

Large trees are particularly valuable. Very large trees - 20 inches diameter or greater - contribute 90 percent of the \$205 billion replacement value of the regional forest.

Urban trees work harder. The average urban tree stores 75% more carbon and has a 76% higher replacement value than the average rural tree.

Source: http://www.houstonregionalforest.org/Report/

The tree canopy in San Antonio removes approximately 10 million pounds of air pollution each year, a service valued at \$22 million.

The tree canopy also manages 665 million cubic feet of stormwater during an average 2-year, 24-hour storm event, a service worth a total of \$1.3 billion. Calculated annually, stormwatter runoff reduction is valued at approximately \$115 million per year (total cost financed at 6% over 20 years).

Source: Urban Ecosystem Analysis Phase 2: Data For Decision Making San Antonio, TX, September 2003,

http://www.americanforests.org/resources/urbanforests/analysis.php

"For local public policymakers responsible for decisions affecting urbanization, the problem is not solely about getting the city or the developer to plant more trees. It is far more complex, involving every aspect of the urbanization process and balancing gray and green infrastructure. While both gray and green infrastructure are important in a city, communities that foster green infrastructure wherever possible are more livable, produce fewer pollutants, and are more cost-effective to operate. However, balancing the gray with the green can be a serious challenge."

Source: American Planning Association, http://www.planning.org/forestry/

Funding Strategies for Undergrounding/Alternatives

San Antonio, Texas

Costs consumers nothing. The city receives 1% of the City Public Services's retail electric sales revenue for a conversion fund to underground lines, relocate lines, or redesign utility poles. They have a nine-step process to select and implement projects.

California

The public utility commission collects a percentage of revenue from wire-based utilities for a special undergrounding fund. To receive these funds a community must form an undergrounding district approved by at least 70% of the property owners in the district. The property owners must agree to pay the \$500-\$2,000 to connect their homes.

Palo Alto, California

There are 3 types of underground districts: 1) General Public Interest and Benefit district where CPAU pays for all construction in the Public Right-of-way; 2) Primarily for Local Public Benefit district where the construction costs in the Public Right-of-way are shared equally between the utility and the residents; and 3) Insufficient Public Benefit, where the requester pays at least 75% of the cost of the undergrounding in the Public Right-of-way. City makes low-interest loans available to property owners to offset the cost of hookup from underground services to their property. Cost is typically \$500-\$2,000 per property.

Oakland, California

Property owners submit a petition to request undergrounding in their neighborhood. The cost is paid by Pacific Gas & Electric, SBC, and the cable company. The property title holders are responsible for all costs associated with panel conversion less \$1,500 if authorized by the Council to be paid by PG&E.

Portland, Oregon

Recommendations of citizen advisory committee: Reserve a portion of utility franchise fees for undergrounding and include undergrounding provisions in future franchise agreements of 1%. City assist property owners in obtaining low-cost financing for conversion and reconnection costs.

Brookline, Massachusetts

A 2% surcharge collected on all wired utility bills of all Brookline customers. This includes electricity, telephone, and cable services. In the case of electrical utility charges, the surcharge is only on the distribution portion of bills reducing the effective surcharge to 1.2%. Exempt from surcharges on their electrical bills are households that qualify for reduced electricity rates. Conversion and reconnection costs are paid from the surcharge.

Tulsa, Oklahoma

Regulators approved distributing costs over ratepayers in the amount of 25 million. Cost to customers is about \$2.00 per month based on cents per kw hour.

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Pennsylvania and Maryland

Main Street improvement grants

General Sources:

U.S. Department of Transportation

FEMA

Community Development Block Grants

Special Assessment Districts

Central City Developer Fees

Utility revenues/capital expenditure amortization

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COA Tree Trimming Task Force — Austin Energy Agreements

Austin Energy has implemented or agrees to implement the following:

- Notify the Neighborhood Associations involved before any planned circuit vegetation maintenance work planning is begun
- Prepare and distribute a customer options sheet with every vegetation work plan
- Purchase flagging for marking trees that has Austin Energy logo on it
- On a tree by tree basis evaluate the selective removal of overhanging limbs on single phase primary wires using the hinge and miss evaluation technique
- Offer to redesign/relocate the lines if possible at the customer's expense
- Provide larger size utility compatible mitigation trees for trees to be planted on COA owned property and PARD will provide watering and care for the 2 year establishment period
- Re-contact all property owners with vegetation work plans on F101

Austin Energy recommends further investigation and evaluation of the following:

- Use of underground cable for rebuild of single phase overhead at customer expense
- Perform a tree re-growth study for predominate Austin tree species and make adjustments to clearances and/or cycles as appropriate
- Investigate and test the use of tree growth regulators and implement where appropriate
- Investigate and implement if appropriate a customer-directed and funded alternative trimming strategy
- Investigate and implement as appropriate the use of a voucher system instead of individual tree delivery for mitigation trees

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